



# Privacy Policy

Personal Data Act (523/1999)  
EU General Data Protection Regulation (2016/679)  
Updated 25 January 2020

## 1. CONTROLLER

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Itula Oy, business ID: 0831792-6  
Tyvitie 4, 56510 Puntala, Finland  
Tel: +358 207 435 500

## 2. CONTACT PERSON IN MATTERS RELATED TO THE FILE

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Satu Pellinen, satu.pellinen(at)itula.fi, +358 40 024 5710  
Tarja Varis, tarja.varis(at)itula.fi, +358 44 066 1620

## 3. DATA PROTECTION OFFICER

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Maarit Hyötylä, maarit.hyotyla(at)itula.fi, +358 400 551517

## 4. NAME OF THE FILE

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Itula Oy's customer and marketing register

## 5. PURPOSE OF PROCESSING PERSONAL DATA

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The primary grounds for processing personal data are the customer relationship between Itula and Itula's customer, or direct marketing (justified benefit). Personal data processing may also be based on the customer's consent, duties derived from law or assignments from the customer.

The customer and marketing register may be used for the following purposes:

- Managing and developing Itula Oy's customer relationships
- Providing Itula Oy's service
- Certifying customer events
- Developing customer service and the business
- Communication
- Marketing
- Analysis and statistics
- Opinion polls, market research and similar purposes

Personal data is processed within the limits permitted and required by the Personal Data Act and the General Data Protection Regulation.

## 6. DATA ON THE FILE

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Data that belongs to the following categories and that is necessary in view of the purpose of the file may be processed on the file:

Basic details, such as:

- First name and last name
- Contact details (such as addresses, phone numbers and email addresses)
- Country of residence
- Language
- Employer's name and contact details
- Title, role

Other data related to the customer relationship and relevant context, such as:

- The start and end date of the relevant context
- Identification data related to using the services (such as the customer number)
- Details on purchases made as an identified customer
- Use of services not subject to charge (such as newsletters)
- Campaigns targeting data subjects
- Details related to invoicing and debt recovery
- Interests and other information provided by data subjects themselves
- Contact and communication related to the customer relationship and other relevant context in various channels and media (such as complaints and other feedback, and recordings of customer service phone calls)
- Direct marketing consent and restrictions, and details related to targeted marketing
- The name or alias of the person who recommended using the service
- Material created by the data subject or applying to the data subject (such as material and communications on social media related to the controller)
- Details about notifications published by the data subject
- Event and user analysis data
- Details about changes to the foregoing data

## 7. REGULAR DATA SOURCES

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Personal data is regularly obtained from customers themselves by phone, electronically and in other manners. Personal data may also be obtained from other registers where the person's name has been provided as a contact person and when Itula Oy must communicate with the contact person for purposes such as sharing construction project files.

### *Cookies*

Our website uses cookies, Facebook pixels and other equivalent technologies to serve our customers as well as possible. Cookies enable us to collect data about the device and how the user arrived at

our site, the browser version and movements on the site. This data may be used to develop the website, analyse user data, target marketing and manage advertising.

If the you do not want the foregoing data to be collected using cookies, most browsers enable cookies to be deactivated and deleted. However, cookies may be necessary for the correct functioning of some of the pages we maintain and the services we offer.

## **8. REGULAR DISCLOSURE OF DATA**

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Data is not regularly disclosed to third parties.

## **9. TRANSFER OF DATA OUTSIDE THE EU OR EEA**

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Customer data is not transferred outside the EU or EEA.

## **10. PRINCIPLES FOR PROTECTING THE FILE**

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The data is saved on Itula Oy's electronic customer relationship management (CRM) system. Only employees who are entitled to process customer data on behalf of their work are authorised to use the systems containing customer data. Every user has their own user ID and password for the system. Users are authenticated via the company's server, which also manages access management. External SSL VPN users are authenticated via the watchguard T35 firewall, which also acts as the company's firewall.

The company has a two-part WPA2-encrypted wireless network: a password is required for corporate access and there is a separate network for customers with a separate password. It is not possible to access the company's network from the customer network.

The servers containing databases are located in a locked area, and they are protected by firewalls from outside parties. Only designated personnel are entitled to log in to the databases.

Backups are scheduled daily. The copies go to local drives on the servers, and they are also packed and stored in the cloud. The functionality of backups is also verified manually twice a month. Agreements have been made with service providers to ensure that their data protection procedures comply with regulations.

The workstations of personnel who process sensitive personal information are encrypted with disk encryption.

The company's computers are updated in accordance with the normal update cycle, while updates are run on servers manually once a month. Workstation updates are also managed by antivirus/computer management software.

## **11. RIGHT OF INSPECTION**

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Data subjects are entitled to inspect the information about them on the controller's customer register. Inspection requests should be made in writing, signed and delivered to the controller at Itula Oy, Tyvitie 4, 56510 Puntala, Finland. Inspection requests must include the data subject's name, organisation's name, address and phone number. The information will be delivered within one month to the address on Itula's register. Under the General Data Protection Regulation, information can be inspected free of charge once a year.

## **12. RIGHT TO DEMAND CORRECTION OR ERASURE**

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Data subjects are entitled to ask the controller to correct or erase incorrect information about them on the register. Requests for information to be corrected or erased must be sent in writing to the contact person for register-related matters. The data will be erased if there is no obligation to retain it on the basis of law or an agreement between Itula and the customer.

## **13. RIGHT OF RESTRICTION**

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Data subjects are entitled to restrict the controller from processing data related to them for the purposes of direct marketing or market research. A restriction can be applied via the link sent in electronic marketing or by contacting customer service by phone on +358 20 7435 500 or by post at Itula Oy's address as stated in Section 11.

## **14. DATA RETENTION PERIOD**

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Itula Oy retains personal data for as long as there are business-related and legal grounds to do so. After this, the data is destroyed by overwriting.